

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

Case Name: _____

Case Number: _____

**APPLICATION FOR AWARD OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES PURSUANT TO 11 USC 330, AND FOR
APPROVAL OF THE PAYMENT OF BANK FEES**

Name of Applicant: _____

Position of Applicant: _____

Application Number: _____ ☐ Interim ☐ Final

The undersigned applicant applies to the court for an award or allowance of compensation for services rendered and for reimbursement of expenses incurred in the above entitled case pursuant to 11 USC 330 (or USC 331 if an interim application), and for approval of the payment of bank fees pursuant to sections 363 and 503(b). This application is supported by the following information and attached documents.

- I. (If applicant is employee of trustee, debtor in possession or creditors committee)
Date of Entry of Order Approving Employment: _____
- II. Dates Covered by this Application: _____ to _____
- III. The name, position, hourly rate, total time spent and amount requested for all compensation for services rendered by each person covered by this application, in connection with this case, is as follows (if this is the **FIRST** Application, include **ALL** time and amounts, both pre- and post-petition in this Application):

Name	Position	Hourly Rate	Total Time	Amount Requested
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
		\$		\$
Totals				\$

- IV. Total amount of REIMBURSEMENT of expenses requested by this application in connection with this case [if this is the **FIRST** Application, include **ALL** costs (including filing fees), both pre- and post-petition]: \$ _____
- V. Total of Compensation and Reimbursement requested: \$ _____

- VI. *(If applicant is a trustee)* The maximum amount of compensation allowable under 11 USC 326(a) is: \$ _____.
- VII. *(If applicant is an employee of trustee, debtor in possession or creditors committee).* All compensation for services rendered and reimbursement of expenses incurred for which award is sought were necessary to the administration of the case, beneficial to the estate, and does not include any unnecessary duplication of services.
- ☐ Yes ☐ No ☐ N/A *(If answer is NO, attach an explanation.)*
- VIII. *(If applicant is the attorney for the debtor)* All compensation for services rendered and reimbursement for expenses incurred for which award is sought for representing the interests of the debtor(s) were necessary and beneficial to the debtor(s) in connection with the case.
- ☐ Yes ☐ No ☐ N/A *(If answer is NO, attach an explanation.)*
- IX. Compensation or reimbursement previously received has been shared with another entity, or an agreement or understanding exists between the applicant and any other entity for sharing of compensation received or to be received for services rendered in or in connection with this case, except as a member or regular associate of a firm of lawyers.
- ☐ Yes ☐ No *(If answer is YES, attach an explanation.)*
- X. Attached to this application, and made part of this application are the following supporting documents:
- a. ☐ Statement of Money or Property Received or Promised Other than by Applicant *(required in all cases, LF 2016A);*
 - b. ☐ Summary Supporting Application for Compensation for Services or Reimbursement of Expenses *(required in all cases, LF 2016B);*
 - c. ☐ Itemization of Services Rendered *(required; itemization must be by project category if cumulative compensation exceeds \$10,000);*
 - d. ☐ Itemization of Expenses *(required);* and
 - e. ☐ Narrative Summary *(required if cumulative compensation exceeds \$10,000, LF 2016C).*
- XI. Bank Fees: \$ _____

The undersigned Applicant states under penalty of perjury that the representations contained in this application and attachments are true and correct to the best of the applicant's knowledge and belief.

DATED: _____

(Signature of Applicant)

Name: _____

Position: _____

Address: _____

Phone: _____

Fax: _____

Email: _____

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

Case Name: _____ Case Number: _____

**STATEMENT OF MONEY OR PROPERTY RECEIVED OR PROMISED
IN CONNECTION WITH THIS CASE OTHER THAN BY APPLICATION OR A PLAN**

Name of Applicant: _____
Position of Applicant: _____
Application Number: _____

No Money or property was received or promised other than by application as a part of a Chapter 13 Plan.

(a) Money or things of value received other than by application or as part of a Chapter 13 Plan:

- (1) Amount received by attorney or firm for filing fee \$ _____
- (2) Amount received before the order for relief by attorney or firm for services and costs \$ _____
- (3) Amount received after the order for relief by attorney or firm for services and costs \$ _____
- (4) Value of any property or service given to attorney or firm as payment of fees and costs \$ _____
Description: _____
- (5) Total of entries 1, 2, 3 and 4 \$ _____
- (6) Amount remaining in client trust account \$ _____

(b) Amount applied to filing fee and services \$ _____
(Subtract entry (a)(6) from entry (a)(5))

(c) Money promised: \$ _____
Nature of arrangement for promise of payment: _____

(d) Total amount and value of all money or property received or promised other than by Application or a Chapter 13 Plan (items (a)(5) and (c)) \$ _____

(e) Other Items (Value and description of any liens, guarantees, security interests or promissory notes): _____

(f) Source of Payment of Promise (If other than the debtor, identify entity and relationship to the debtor): _____

STATEMENT OF MONEY OR PROPERTY RECEIVED

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

Case Name: *In re Giga Watt, Inc.*

Case Number: 18-03197

Name of Applicant: Potomac Law Group PLLC, Pamela M. Egan
 Position of Applicant: Counsel to Mark D. Waldron, in his capacity as Chapter 7 Trustee
 Application Number: Five (5)

Sequential #		Applied For	Awarded	Received
A Receipts other than by Application (Transfer from (b) of Application LF 2016A)	Date			n/a
	Compensation			\$0.00
	Expenses			\$0.00
Prior Application #1	Date	3/10/2021	4/14/2021	4/21/2021
	Compensation	\$30,040.00	\$30,040.00	\$30,040.00
	Expenses	\$0.00	\$0.00	\$0.00
Prior Application #2	Date	7/16/2021	8/17/2021	8/20/2021
	Compensation	\$42,680.00	\$42,680.00	\$42,680.00
	Expenses	\$0.00	\$0.00	\$0.00
Prior Application #3	Date	4/1/2022	5/3/2022	5/4/2022
	Compensation	\$65,360.00	\$65,360.00	\$65,360.00
	Expenses	\$350.00	\$350.00	\$350.00
Prior Application #4	Date	8/22/2022	9/21/2022	9/26/2022
	Compensation	\$65,320.00	\$65,320.00	\$65,320.00
	Expenses	\$31.71	\$31.71	31.71
Present Application (Transfer totals from III & IV of Application) #5	Date	1/31/2023		
	Compensation	\$74,800.00		
	Expenses	\$482.31		
Totals B	Compensation	\$ 278,200.00	\$ 203,400.00	\$ 203,400.00
	Expenses	\$ 864.02	\$ 381.71	\$ 381.71
	Total Comp. + Exp.	\$ 279,064.02	\$ 203,781.71	\$ 203,781.71

Potomac Law Group Fifth Interim Fee Application

Project Summary

Project Description	Total Time	Billable Amt
Meetings of and Communications with Creditors	0.8	\$ 320.00
Fee/Employment Applications	4.6	\$ 1,840.00
Communications with USTO	7.9	\$ 3,160.00
Preliminary Injunctions	2.4	\$ 960.00
Perkins' Appeal	89.7	\$ 35,880.00
Mr. Dam's Two Appeals	81.6	\$ 32,640.00
Totals	187.0	\$ 74,800.00

POTOMAC LAW GROUP, PLLC - Time Entry

Date Start: 5/27/2022 | Date End: 1/23/2023 | Clients: Law Offices of Mark D. Waldron, PLLC | Matters: Chapter 7 Trustee | Users: All - Pamela M. Egan |

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee							
12/07/2022	Creditor Communications	Telephone conference with K. McKinley providing an update	0.80	0.80	\$320.00	0.80	\$320.00
08/21/2022	Fee/Employment Applications	Draft fourth interim fee application (4.0); confer with client	4.00	4.00	\$1,600.00		
09/20/2022	Fee/Employment Applications	Prepare for hearing on PLG's Fourth Interim Fee Application (.3); attend hearing on PLG's Fourth Interim Fee Application (.3)	0.60	0.60	\$240.00		
						4.60	\$1,840.00
08/22/2022	Communications With USTO	Prepare confidential package of information for review by USTO regarding facts of case (7.3); conference with client (.2)	7.50	7.50	\$3,000.00		
08/23/2022	Communications With USTO	Finalize Usmanov packet for USTO	0.40	0.40	\$160.00		
						7.90	\$3,160.00
06/12/2022	Preliminary Injunction	Review Mr. Dam's opposition to Trustee's motion to modify preliminary injunction (.4); confer with client	0.40	0.40	\$160.00		
06/21/2022	Preliminary Injunction	Draft Notice of Hearing on Motion to Modify Preliminary Injunction	0.10	0.10	\$40.00		
06/28/2022	Preliminary Injunction	Prepare for oral argument on motion to modify preliminary injunction to allow Trustee to intervene in District Court action by J. Dam against Perkins (.9); attend Oral argument on motion to modify preliminary injunction (.7); confer with client before and after	1.60	1.60	\$640.00		
08/02/2022	Preliminary Injunction	Skim supplemental brief and declaration filed by Mr. Dam regarding the Trustee's motion to modify preliminary injunction	0.20	0.20	\$80.00		
08/11/2022	Preliminary Injunction	Hearing on motion to modify preliminary injunction against J. Dam to allow Trustee to intervene in District Court action; confer with client	0.10	0.10	\$40.00		
						2.40	\$960.00
07/03/2022	Perkins 9th Circuit Appeal	Analyze issues related to and outline appellee's brief on arbitration appeal	6.50	6.50	\$2,600.00		
07/04/2022	Perkins 9th Circuit Appeal	Work on appellee's brief re arbitration	9.30	9.30	\$3,720.00		

FEE ITEMIZATION (BY PROJECT)

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt.	Billable Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee							
07/05/2022	Perkins 9th Circuit Appeal	Draft appellee's brief re arbitration (9.3); confer with client (.2)	9.50	9.50	\$3,800.00		
07/23/2022	Perkins 9th Circuit Appeal	Review notice of appeal of Order Denying Arbitration (.2); confer with client re same (.2)	0.40	0.40	\$160.00		
09/19/2022	Perkins 9th Circuit Appeal	Review 9th Circuit Rules before drafting motion to dismiss arbitration appeal (.2); review rules of appellate procedure re motions (.2); draft motion to dismiss (5.3)	0.00	5.70	\$0.00		
10/02/2022	Perkins 9th Circuit Appeal	Work on motion to dismiss arbitration appeal	0.00	1.70	\$0.00		
10/03/2022	Perkins 9th Circuit Appeal	Create index of new evidence matched to complaint paragraphs as exhibit to motion to dismiss/remand appeal	0.00	4.50	\$0.00		
10/05/2022	Perkins 9th Circuit Appeal	Draft motion to remand and dismissal	0.00	7.60	\$0.00		
10/06/2022	Perkins 9th Circuit Appeal	Finalize motion to dismiss/remand; draft and compile Request for Judicial notice; draft and compile exhibit book	0.00	7.70	\$0.00		
10/07/2022	Perkins 9th Circuit Appeal	Compile evidence for motion for remand	0.00	8.10	\$0.00		
10/09/2022	Perkins 9th Circuit Appeal	Compile new evidence for motion for remand; confer with client	0.00	8.50	\$0.00		
10/09/2022	Perkins 9th Circuit Appeal	Finish compiling evidence for motion for remand;	0.00	2.10	\$0.00		
10/12/2022	Perkins 9th Circuit Appeal	Finalize file packet for motion for remand	0.00	8.40	\$0.00		
11/23/2022	Perkins 9th Circuit Appeal	Notice of Acknowledgement of Oral Argument	0.10	0.10	\$40.00		
11/28/2022	Perkins 9th Circuit Appeal	Draft motion to dismiss appeal	3.00	3.00	\$1,200.00		
11/29/2022	Perkins 9th Circuit Appeal	Draft motion to dismiss appeal (8.2); confer with client (.4)	8.60	8.60	\$3,440.00		
11/30/2022	Perkins 9th Circuit Appeal	Finalize motion to dismiss (7.7); draft email to clerk of court re mootness per local rules (.2); draft email to Cromwell and other attorneys regarding intent to file motion to dismiss appeal as moot (.2); finalize Request for Judicial Notice (.6); draft supporting Egan Declaration (1.0); finalize papers for filing	9.70	9.70	\$3,880.00		
12/03/2022	Perkins 9th Circuit Appeal	Prepare for oral argument: develop argument re collateral attack doctrine	3.60	3.60	\$1,440.00		

FEE ITEMIZATION (BY PROJECT)

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee							
12/04/2022	Perkins 9th Circuit Appeal	Oral argument prep	7.10	7.10	\$2,840.00		
12/05/2022	Perkins 9th Circuit Appeal	Research background of panel judges (.5); develop argument on issue preclusion (.3); read supplemental materials submitted by Perkins after briefing (.5); outline oral argument (5.7); confer with client (.3)	7.30	7.30	\$2,920.00		
12/06/2022	Perkins 9th Circuit Appeal	Finalize and practice oral argument	7.40	7.40	\$2,960.00		
12/07/2022	Perkins 9th Circuit Appeal	Oral argument prep and attendance (3.3); confer with client (.2)	3.50	3.50	\$1,400.00		
01/11/2023	Perkins 9th Circuit Appeal	Review FRAP re motion for rehearing and motion for stay	0.30	0.70	\$120.00		
01/13/2023	Perkins 9th Circuit Appeal	Research issues in prep for responding to motion to stay mandate pending writ of certiorari (3.2); confer with client (.3)	3.50	7.00	\$1,400.00		
01/14/2023	Perkins 9th Circuit Appeal	Read majority view case law re divestment rule	1.10	3.30	\$440.00		
01/17/2023	Perkins 9th Circuit Appeal	Work on opposition to motions to stay motion for panel rehearing and to stay mandate issuance pending petition for writ of certiorari	4.20	8.50	\$1,680.00		
01/18/2023	Perkins 9th Circuit Appeal	Confer with client re opposition to stay motions (.1); finalize response to motion for stay pending Petition for Rehearing and motion to stay mandate's issuance (4.4)	4.50	9.00	\$1,800.00		
01/19/2023	Perkins 9th Circuit Appeal	Review court order granting motion to stay; confer with client	0.10	0.10	\$40.00		
			<hr/>			89.70	158.90 \$35,880.00
05/27/2022	J. Dam Consolidated Appeals	Finalize motion to dismiss appeal of Preliminary Injunction for lack of jurisdiction (interlocutory; no motion for permission) (3.9); finalize request for judicial notice in support thereof (.2); finalize Egan declaration in support thereof (.3); confer with client (.1)	4.50	4.50	\$1,800.00		
05/31/2022	J. Dam Consolidated Appeals	Review J. Dam's motion to file documents under seal (.1); review J. Dam's appellate appendix (vol. 2 of 2) (not filed under seal) (.3)	0.40	0.40	\$160.00		
06/01/2022	J. Dam Consolidated Appeals	Review J. Dam's motion to extend briefing schedule (.1) and draft response thereto (.2); confer with client	0.30	0.30	\$120.00		
06/01/2022	J. Dam Consolidated Appeals	Research issues relevant to appeal in preparation for drafting answering appellate brief	4.40	4.40	\$1,760.00		
06/02/2022	J. Dam Consolidated Appeals	Review appellate brief, including cases cited therein, in preparation for drafting responsive brief	6.50	6.50	\$2,600.00		

FEE ITEMIZATION (BY PROJECT)

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt.	Billable Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee							
06/02/2022	J. Dam Consolidated Appeals	Review appellate brief scheduling order (.1)	0.10	0.10	\$40.00		
06/03/2022	J. Dam Consolidated Appeals	Outline/early drafting of appellee's brief re automatic stay	7.40	7.40	\$2,960.00		
06/05/2022	J. Dam Consolidated Appeals	Draft appellee's brief in Pl and AS appeal (6.3); confer with client (.2)	6.50	6.50	\$2,600.00		
06/06/2022	J. Dam Consolidated Appeals	Draft appellee's brief automatic stay	7.40	7.40	\$2,960.00		
06/08/2022	J. Dam Consolidated Appeals	Review order denying appellant's motion to seal	0.10	0.10	\$40.00		
06/09/2022	J. Dam Consolidated Appeals	Draft appellee's brief on automatic stay and preliminary injunction (7.5); review appellant's appendix of record filed under seal (1.0)	8.50	8.50	\$3,400.00		
06/17/2022	J. Dam Consolidated Appeals	Review Mr. Dam's memorandum in opposition to the Trustee's motion to dismiss the Pl appeal for lack of jurisdiction (2.3); review J. Dam's request for judicial notice (.1); review Order denying Appellant's motion for judicial notice (.1); confer with client	2.50	2.50	\$1,000.00		
06/21/2022	J. Dam Consolidated Appeals	Draft reply memorandum re motion to dismiss appeal (3.2); draft request for judicial notice re same (.3)	3.80	3.80	\$1,520.00		
06/22/2022	J. Dam Consolidated Appeals	Review Mr. Dam's memorandum in opposition to Trustee's request for judicial notice	0.10	0.10	\$40.00		
06/24/2022	J. Dam Consolidated Appeals	Draft reply re opposition to request for judicial notice	0.50	0.50	\$200.00		
06/27/2022	J. Dam Consolidated Appeals	Draft appellee brief (3.3), motion to strike (2.4), and motion for sanctions (.8); finalize supplemental excerpt of record	6.50	6.50	\$2,600.00		
06/30/2022	J. Dam Consolidated Appeals	Confer with client (.2); finalize Appellee's brief (5.5); finalize appendix (.8)	6.50	6.50	\$2,600.00		
06/30/2022	J. Dam Consolidated Appeals	Finalize motion to strike noncomplying statement of the case	3.50	3.50	\$1,400.00		
07/02/2022	J. Dam Consolidated Appeals	Draft motion for sanctions	3.50	3.50	\$1,400.00		
07/07/2022	J. Dam Consolidated Appeals	Review J. Dam's opposition to motion to strike Appellant's Noncomplying Statement of the Case	0.50	0.50	\$200.00		
07/12/2022	J. Dam Consolidated Appeals	Review J. Dam's opposition to motion for sanctions (.4)	0.40	0.40	\$160.00		
07/14/2022	J. Dam Consolidated Appeals	Draft reply to opposition to motion to strike noncomplying statement of the case (2.5); draft reply to opposition to motion for sanctions (3.4); confer with client (.1)	6.00	6.00	\$2,400.00		

FEE ITEMIZATION (BY PROJECT)

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee							
07/19/2022	J. Dam Consolidated Appeals	Review Order Setting Status Conference	0.10	0.10	\$40.00		
07/23/2022	J. Dam Consolidated Appeals	Review motion to consolidate automatic stay and preliminary injunction appeals (.1); confer with client re same (.2)	0.30	0.30	\$120.00		
07/23/2022	J. Dam Consolidated Appeals	Correspondence with L. Hurst, counsel for J. Dam, re briefing schedule on PI appeal	0.10	0.10	\$40.00		
07/30/2022	J. Dam Consolidated Appeals	Review appellant's reply brief	0.90	0.90	\$360.00		
08/01/2022	J. Dam Consolidated Appeals	Review District Court's Order staying AS and PI appeals pending mediation; confer with client	0.10	0.10	\$40.00		
10/31/2022	J. Dam Consolidated Appeals	Review draft status report	0.10	0.10	\$40.00		
12/21/2022	J. Dam Consolidated Appeals	Review draft status report	0.10	0.10	\$40.00		
					81.60	81.60	\$32,640.00
			187.00	256.20	\$74,800.00	187.00	256.20 \$74,800.00

POTOMAC LAW GROUP, PLLC - Time Entry - Chronological

Date Start: 5/27/2022 | Date End: 1/23/2023 | Clients: Law Offices of Mark D. Waldron, PLLC | Matters: Chapter 7 Trustee | Users: All - Pamela M. Egan |

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Time (Subtotal)	Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee								
12/07/2022	Creditor Communications	Telephone conference with K. McKinley providing an update	0.80	0.80	\$320.00	0.80	0.80	\$320.00
08/21/2022	Fee/Employment Applications	Draft fourth interim fee application (4.0); confer with client	4.00	4.00	\$1,600.00	4.60	4.60	\$1,840.00
09/20/2022	Fee/Employment Applications	Prepare for hearing on PLG's Fourth Interim Fee Application (.3); attend hearing on PLG's Fourth Interim Fee Application (.3)	0.60	0.60	\$240.00			
08/22/2022	Communications With USTO	Prepare confidential package of information for review by USTO regarding facts of case (7.3); conference with client	7.50	7.50	\$3,000.00	7.90	7.90	\$3,160.00
08/23/2022	Communications With USTO	Finalize Usmanov packet for USTO	0.40	0.40	\$160.00			
06/12/2022	Preliminary Injunction	Review Mr. Dam's opposition to Trustee's motion to modify preliminary injunction (.4); confer with client	0.40	0.40	\$160.00	2.40	2.40	\$960.00
06/21/2022	Preliminary Injunction	Draft Notice of Hearing on Motion to Modify Preliminary Injunction	0.10	0.10	\$40.00			
06/28/2022	Preliminary Injunction	Prepare for oral argument on motion to modify preliminary injunction to allow Trustee to intervene in District Court action by J. Dam against Perkins (.9); attend Oral argument on motion to modify preliminary injunction (.7); confer with client before and after	1.60	1.60	\$640.00			
08/02/2022	Preliminary Injunction	Skim supplemental brief and declaration filed by Mr. Dam regarding the Trustee's motion to modify preliminary injunction	0.20	0.20	\$80.00			
08/11/2022	Preliminary Injunction	Hearing on motion to modify preliminary injunction against J. Dam to allow Trustee to intervene in District Court action (.1); confer with client	0.10	0.10	\$40.00	2.40	2.40	\$960.00
07/03/2022	Perkins 9th Circuit Appeal	Analyze issues related to and outline appellee's brief on arbitration appeal	6.50	6.50	\$2,600.00			

Fee Itemization - Chronological

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Time (Subtotal)	Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee								
07/04/2022	Perkins 9th Circuit Appeal	Work on appellee's brief re arbitration	9.30	9.30	\$3,720.00			
07/05/2022	Perkins 9th Circuit Appeal	Draft appellee's brief re arbitration (9.3); confer with client (.2)	9.50	9.50	\$3,800.00			
07/23/2022	Perkins 9th Circuit Appeal	Review notice of appeal of Order Denying Arbitration (.2); confer with client re same (.2)	0.40	0.40	\$160.00			
09/19/2022	Perkins 9th Circuit Appeal	Review 9th Circuit Rules before drafting motion to dismiss arbitration appeal (.2); review rules of appellate procedure re motions (.2); draft motion to dismiss (5.3)	0.00	5.70	\$0.00			
10/02/2022	Perkins 9th Circuit Appeal	Work on motion to dismiss arbitration appeal	0.00	1.70	\$0.00			
10/03/2022	Perkins 9th Circuit Appeal	Create index of new evidence matched to complaint paragraphs as exhibit to motion to dismiss/remand appeal	0.00	4.50	\$0.00			
10/05/2022	Perkins 9th Circuit Appeal	Draft motion to remand and dismissal	0.00	7.60	\$0.00			
10/06/2022	Perkins 9th Circuit Appeal	Finalize motion to dismiss/remand; draft and compile Request for Judicial notice; draft and compile exhibit book	0.00	7.70	\$0.00			
10/07/2022	Perkins 9th Circuit Appeal	Compile evidence for motion for remand	0.00	8.10	\$0.00			
10/09/2022	Perkins 9th Circuit Appeal	Compile new evidence for motion for remand; confer with client	0.00	8.50	\$0.00			
10/09/2022	Perkins 9th Circuit Appeal	Finish compiling evidence for motion for remand	0.00	2.10	\$0.00			
10/12/2022	Perkins 9th Circuit Appeal	Finalize file packet for motion for remand	0.00	8.40	\$0.00			
11/23/2022	Perkins 9th Circuit Appeal	Notice of Acknowledgement of Oral Argument	0.10	0.10	\$40.00			
11/28/2022	Perkins 9th Circuit Appeal	Draft motion to dismiss appeal	3.00	3.00	\$1,200.00			
11/29/2022	Perkins 9th Circuit Appeal	Draft motion to dismiss appeal (8.2); confer with client (.4)	8.60	8.60	\$3,440.00			
11/30/2022	Perkins 9th Circuit Appeal	Finalize motion to dismiss (7.7); draft email to clerk of court re mootness per local rules (.2); draft email to Cromwell and other attorneys regarding intent to file motion to dismiss appeal as moot (.2); finalize Request for Judicial Notice (.6); draft supporting Egan Declaration (1.0); finalize papers for filing	9.70	9.70	\$3,880.00			

Fee Itemization - Chronological

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Time (Subtotal)	Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee								
12/03/2022	Perkins 9th Circuit Appeal	Prepare for oral argument: develop argument re collateral attack doctrine	3.60	3.60	\$1,440.00	(Subtotal)		
12/04/2022	Perkins 9th Circuit Appeal	Oral argument prep	7.10	7.10	\$2,840.00			
12/05/2022	Perkins 9th Circuit Appeal	Research background of panel judges (.5); develop argument on issue preclusion (.3); read supplemental materials submitted by Perkins after briefing (.5); outline oral argument (5.7); confer with client (.3)	7.30	7.30	\$2,920.00			
12/06/2022	Perkins 9th Circuit Appeal	Finalize and practice oral argument	7.40	7.40	\$2,960.00			
12/07/2022	Perkins 9th Circuit Appeal	Oral argument prep and attendance (3.3); confer with client (.2)	3.50	3.50	\$1,400.00			
01/11/2023	Perkins 9th Circuit Appeal	Review FRAP re motion for rehearing and motion for stay	0.30	0.70	\$120.00			
01/13/2023	Perkins 9th Circuit Appeal	Research issues in prep for responding to motion to stay mandate pending writ of certiorari (3.2); confer with client (.3)	3.50	7.00	\$1,400.00			
01/14/2023	Perkins 9th Circuit Appeal	Read majority view case law re divestment rule	1.10	3.30	\$440.00			
01/17/2023	Perkins 9th Circuit Appeal	Work on opposition to motions to stay motion for panel rehearing and to stay mandate issuance pending petition for writ of certiorari	4.20	8.50	\$1,680.00			
01/18/2023	Perkins 9th Circuit Appeal	Confer with client re opposition to stay motions (.1); finalize response to motion for stay pending Petition for Rehearing and motion to stay mandate's issuance (4.4)	4.50	9.00	\$1,800.00			
01/19/2023	Perkins 9th Circuit Appeal	Review court order granting motion to stay; confer with client	0.10	0.10	\$40.00	89.70	158.90	\$35,880.00
05/27/2022	J. Dam Consolidated Appeals	Finalize motion to dismiss appeal of Preliminary Injunction for lack of jurisdiction (interlocutory; no motion for permission) (3.9); finalize request for judicial notice in support thereof (.2); finalize Egan declaration in support thereof (.3); confer with client (.1)	4.50	4.50	\$1,800.00			
05/31/2022	J. Dam Consolidated Appeals	Review J. Dam's motion to file documents under seal (.1); review J. Dam's appellate appendix (vol. 2 of 2) (not filed under seal) (.3)	0.40	0.40	\$160.00			
06/01/2022	J. Dam Consolidated Appeals	Review J. Dam's motion to extend briefing schedule (.1) and draft response thereto (.2); confer with client	0.30	0.30	\$120.00			
06/01/2022	J. Dam Consolidated Appeals	Research issues relevant to appeal in preparation for drafting answering appellate brief	4.40	4.40	\$1,760.00			

Fee Itemization - Chronological

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Time (Subtotal)	Tot. Time (Subtotal)	Billable Amt. (Subtotal)
Chapter 7 Trustee								
06/02/2022	J. Dam Consolidated Appeals	Review appellee brief, including cases cited therein, in preparation for drafting responsive brief	6.50	6.50	\$2,600.00			
06/02/2022	J. Dam Consolidated Appeals	Review appellee brief scheduling order (.1)	0.10	0.10	\$40.00			
06/03/2022	J. Dam Consolidated Appeals	Outline/early drafting of appellee's brief re automatic stay	7.40	7.40	\$2,960.00			
06/05/2022	J. Dam Consolidated Appeals	Draft appellee's brief in PI and AS appeal (6.3); confer with client (.2)	6.50	6.50	\$2,600.00			
06/06/2022	J. Dam Consolidated Appeals	Draft appellee's brief automatic stay	7.40	7.40	\$2,960.00			
06/08/2022	J. Dam Consolidated Appeals	Review order denying appellant's motion to seal	0.10	0.10	\$40.00			
06/09/2022	J. Dam Consolidated Appeals	Draft appellee's brief on automatic stay and preliminary injunction (7.5); review appellant's appendix of record filed under seal (1.0)	8.50	8.50	\$3,400.00			
06/17/2022	J. Dam Consolidated Appeals	Review Mr. Dam's memorandum in opposition to the Trustee's motion to dismiss the PI appeal for lack of jurisdiction (2.3); review J. Dam's request for judicial notice (.1); review Order denying Appellant's motion for judicial notice (.1); confer with client	2.50	2.50	\$1,000.00			
06/21/2022	J. Dam Consolidated Appeals	Draft reply memorandum re motion to dismiss appeal (3.2); draft request for judicial notice re same (.3)	3.80	3.80	\$1,520.00			
06/22/2022	J. Dam Consolidated Appeals	Review Mr. Dam's memorandum in opposition to Trustee's request for judicial notice	0.10	0.10	\$40.00			
06/24/2022	J. Dam Consolidated Appeals	Draft reply re opposition to request for judicial notice	0.50	0.50	\$200.00			
06/27/2022	J. Dam Consolidated Appeals	Draft appellee brief (3.3), motion to strike (2.4), and motion for sanctions (.8); finalize supplemental excerpt of record	6.50	6.50	\$2,600.00			
06/30/2022	J. Dam Consolidated Appeals	Confer with client (.2); finalize Appellee's brief (5.5); finalize appendix (.8)	6.50	6.50	\$2,600.00			
06/30/2022	J. Dam Consolidated Appeals	Finalize motion to strike noncomplying statement of the case	3.50	3.50	\$1,400.00			
07/02/2022	J. Dam Consolidated Appeals	Draft motion for sanctions	3.50	3.50	\$1,400.00			
07/07/2022	J. Dam Consolidated Appeals	Review J. Dam's opposition to motion to strike Appellant's Noncomplying Statement of the Case	0.50	0.50	\$200.00			
07/12/2022	J. Dam Consolidated Appeals	Review J. Dam's opposition to motion for sanctions (.4)	0.40	0.40	\$160.00			

Fee Itemization - Chronological

Date	Task Code	Description	Billable Time	Tot. Time	Billable Amt	Billable Time (Subtotal)	Tot. Time (Subtotal)	Billable Amt. (Subtotal)		
Chapter 7 Trustee										
07/14/2022	J. Dam Consolidated Appeals	Draft reply to opposition to motion to strike noncomplying statement of the case (2.5); draft reply to opposition to motion for sanctions (3.4); confer with client (.1)	6.00	6.00	\$2,400.00	(Subtotal)				
07/19/2022	J. Dam Consolidated Appeals	Review Order Setting Status Conference	0.10	0.10	\$40.00					
07/23/2022	J. Dam Consolidated Appeals	Review motion to consolidate automatic stay and preliminary injunction appeals (.1); confer with client re same (.2)	0.30	0.30	\$120.00					
07/23/2022	J. Dam Consolidated Appeals	Correspondence with L. Hurst, counsel for J. Dam, re briefing schedule on PI appeal	0.10	0.10	\$40.00					
07/30/2022	J. Dam Consolidated Appeals	Review appellant's reply brief	0.90	0.90	\$360.00					
08/01/2022	J. Dam Consolidated Appeals	Review District Court's Order staying AS and PI appeals pending mediation; confer with client	0.10	0.10	\$40.00					
10/31/2022	J. Dam Consolidated Appeals	Review draft status report	0.10	0.10	\$40.00					
12/21/2022	J. Dam Consolidated Appeals	Review draft status report	0.10	0.10	\$40.00					
									81.60	81.60
Totals						187.00			256.20	\$74,800.00



POTOMAC LAW GROUP, PLLC - Expense Report

Date Start: 5/27/2022 | Date End: 1/21/2023 | Clients: Law Offices of Mark D. Waldron, PLLC | Matters: | Users: All |
Matter Type: All | Group By: Client

Expense Date	Invoice Id	Client	Matter	User	Expense Type	Description	Status	Cost	Bill Price
Law Offices of Mark D. Waldron, PLLC									
07/13/2022		Law Offices of Mark D. Waldron, PLLC	Chapter 7 Trustee	Pamela Egan	E102 - Outside printing	Six copies of appellee's brief and three copies of appellee's supplemental excerpt of record - 9th Cir., Perkins' Appeal - Arbitration	Ready For Billing	\$210.08	\$210.08
08/22/2022		Law Offices of Mark D. Waldron, PLLC	Chapter 7 Trustee	Pamela Egan	E108 - Postage	Service of 4th Interim Fee App to Limited Notice List	Ready For Billing	\$11.40	\$11.40
10/18/2022		Law Offices of Mark D. Waldron, PLLC	Chapter 7 Trustee	Pamela Egan	E108 - Postage	Registered Mail of Notice of Default to GW Sg.	Ready For Billing	\$20.83	\$20.83
10/18/2022		Law Offices of Mark D. Waldron, PLLC	Chapter 7 Trustee	Pamela Egan	E108 - Postage	FedEx Briefs and Supplemental Excerpt of Record to 9th Circuit Court of Appeals	Ready For Billing	\$213.35	\$213.35
01/06/2023		Law Offices of Mark D. Waldron, PLLC	Adversary Proceeding (20-80031)	Pamela Egan	E108 - Postage	Postage for Mailing: (1) FAC, (2) Reissued Summons, (3) Notc of Scheduling Conference to T. Usmanov at Temecula address	Ready For Billing	\$12.75	\$12.75
01/11/2023		Law Offices of Mark D. Waldron, PLLC	Chapter 7 Trustee	Pamela Egan	E108 - Postage	Mail contempt papers to Perkins Group per their demand	Ready For Billing	\$13.90	\$13.90
Totals Billable Amounts for Law Offices of Mark D. Waldron, PLLC								\$482.31	\$482.31
Grand Total								\$482.31	\$482.31

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

Case Name: Giga Watt, Inc.

Case Number: 18-03197 FPC

NARRATIVE SUMMARY
(Required by LBR 2016-1(b)(1)(A) where requested
compensation exceeds \$10,000.00)

Name of Applicant:	Potomac Law Group PLLC
Position of Applicant:	General Insolvency Counsel to Chapter 7 Trustee
Application Number:	Fifth (5)
Application Period:	May 27, 2022 – January 21, 2023 – 240-Day Period
Fees Requested:	\$74,800.00
Expenses Requested:	\$ 482.31

I. Introduction

This Application seeks fees accrued over an 8-month or 240-day period, May 27, 2022 through January 21, 2023 (the “Application Period”).

The Potomac Law Group PLLC (“PLG”) represents the Trustee pursuant to two employment Orders: *Order Approving Employment Under 11 U.S.C. § 327 By Trustee/Debtor-in-Possession*, dated October 27, 2020 [[ECF 785](#)], pursuant to which PLG was retained as counsel to the Chapter 7 Trustee (“Hourly Employment Order”), and the *Order Approving Employment Under 11 U.S.C. § 327 By Trustee/Debtor-in-Possession*, dated December 14, 2020 [[ECF 840](#)] (“Contingent Fee Employment Order”), pursuant to which PLG was retained on a contingent fee basis to represent the Debtor in an adversary proceeding that the

Trustee brought against Perkins Coie, LLP (“Perkins”), Lowell Ness (“Ness”), and others, Case No. 20-80053 (“Perkins Adversary”).

This Application seeks compensation for work performed pursuant to the Hourly Employment Order, which includes appellate work in Mr. Dam’s consolidated appeals in the District Court of this Court’s Automatic Stay and Preliminary Injunction Order and Perkins’ appeal to the Court of Appeals for the Ninth Circuit regarding the arbitrability of the Trustee’s original complaint.

This Application seeks reimbursement of expenses as itemized below:

Expense Date	Expense Type	Description	Cost
07/13/2022	E102 - Outside printing	Six copies of appellee’s brief and three copies of appellee’s supplemental excerpt of record - 9th Cir., Perkins’ Appeal - Arbitration	\$210.08
08/22/2022	E108 - Postage	Service of 4th Interim Fee App to Limited Notice List	\$11.40
10/18/2022	E108 - Postage	Registered Mail of Notice of Default to GW Sg.	\$20.83
10/18/2022	E108 - Postage	FedEx Briefs and Supplemental Excerpt of Record to 9th Circuit Court of Appeals	\$213.35
01/06/2023	E108 - Postage	Postage for Mailing: (1) FAC, (2) Reissued Summons, (3) Notice of Scheduling Conference to T. Usmanov at Temecula address	\$12.75
01/11/2023	E108 - Postage	Mail contempt papers to Perkins Group per their demand	\$13.90
Total			\$482.31

II. Background of the Case

A. Conversion

On November 19, 2018, Giga Watt, Inc. (“Giga Watt”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On September 30, 2020, the Bankruptcy Court entered an Order converting the bankruptcy case from Chapter 11 to Chapter 7 of the Bankruptcy Code, [ECF No. 744](#). The same day, the U.S. Trustee’s Office appointed Mark D. Waldron as Trustee in the Chapter 7 case, [ECF No. 745](#).

B. Giga Watt Background

The Trustee has previously provided the Court narratives regarding the facts as they developed, including in the Narrative Summaries set forth in the *First Interim Application for Award of Compensation for Services Rendered and Reimbursement of Expenses*, dated March 10, 2021, ECF 863, the *Second Interim Application for Award of Compensation for Services Rendered and Reimbursement of Expenses*, dated July 16, 2021, ECF 898, the *Third Interim Application for Award of Compensation for Services Rendered and Reimbursement of Expenses*, dated April 1, 2022, ECF No. 940 and the *Fourth Interim Application for Award of Compensation for Services Rendered and Reimbursement of Expenses*, dated August 22, 2022, ECF No. 959. They are incorporated herein by reference as if set forth fully herein.

C. Financial Condition of the Estate

1. Profit and Loss: Not applicable. Debtor is not operating.
2. Amount of Cash on Hand or on Deposit: \$566,876.97.
3. Amount of Accrued Unpaid Administrative Expenses:

Expense Description	Amount
Accountants' Fees	\$7,000.00 (est'd)
Attorneys' Fees accrued after Application Period (through date of filing of this Application)	\$0.00
Lighthouse Documents	\$1,400.00
Total	\$8,400.00

The amount owed to Lighthouse for document processing will be offset entirely by a contribution from Perkins Coie LLP to share the cost of obtaining and processing the Lighthouse Documents.

4. Amount of Unencumbered Funds in the Estate: \$454,876.97

Pursuant to the *Order*: (i) *Approving the Sale of Moses Lake Equipment and Related Relief*, (ii) *Approving Bid Procedures*, and (iii) *Shortening Time to Object*, [ECF 765](#) (“ML Equipment Sale Order”) the Trustee is holding an additional \$112,000 in sales proceeds, subject to resolution of claims asserted by certain WTT Token and miner purchasers.

III. Description of Projects for Which Compensation is Sought

Project Description	Total Time	Billable Amt
Meetings of and Communications with Creditors	0.8	\$ 320.00
Fee/Employment Applications	4.6	\$ 1,840.00
Communications with USTO	7.9	\$ 3,160.00
Preliminary Injunctions	2.4	\$ 960.00
Perkins' Appeal	89.7	\$ 35,880.00
Mr. Dam's Two Appeals	81.6	\$ 32,640.00
Totals	187.0	\$ 74,800.00

A. Meetings of and Communications With Creditors

During the Application Period, PLG conferred with counsel for the Douglas County Public Utility, which has filed a claim for more than \$300,000.

Time: .8

Amount: \$320.00

B. Fee/Employment Applications

During the Application Period, PLG drafted the Trustee's Fourth's Interim Fee Application, *Application for Award of Compensation for Services Rendered and Reimbursement of Expenses Pursuant to 11 U.S.C. § 330, and for Approval of the Payment of Bank Fees*, dated August 22, 2022, ECF No. 959, which the Court granted. *See Order Awarding Compensation for Services Rendered and Reimbursement of Expenses Pursuant to 11 U.S.C. § 330 and § 331, and*

Approving the Payment of Bank Fees, dated September 21, 2022, ECF No. 966.

The amount requested for this project is less than 5% of the total awarded fees, which totaled \$65,320.00.

Time: 4.6

Amount: \$1,600

C. Communication with USTO

As the Court is aware, the Giga Watt Project raised issues including tax, bank, and immigration fraud, as well as indicia of money laundering, which the Trustee shared with the United States Trustee's Office.

Time: 7.9

Amount: \$3,160

D. Preliminary Injunction

This project relates to the Trustee's motion to modify the Preliminary Injunction.

During the Application Period, the Trustee prepared for and attended oral argument. In light of the District Court's stay of Mr. Dam's two appeals relating to the Automatic Stay and Preliminary Injunction, this Court stayed the motion pending mediation, which is ongoing.

Time: 2.4

Amount: \$960

E. Perkins' Appeal to the Ninth Circuit of the Arbitration Order

Perkins has appealed the District Court's *Order Denying Motions and Appeals*, dated January 7, 2022, ECF No. 21. The *Order Denying Motions and Appeals* affirmed this Court's *Order Denying Perkins' and Ness' Motion to Compel Arbitration and Stay*, dated April 22, 2021, ECF No. 51. The appeal is *Waldron v. Perkins*, Case No. 22-35104 pending in the United State Court of Appeals for the Ninth Circuit.

During the Application Period, PLG drafted the appellee's brief, filed two motions to dismiss the appeal as moot, and opposed three post-petition motions filed by Perkins after the Court of Appeals dismissed the appeal as moot.

Applicant filed the Trustee's first motion to dismiss the appeal as moot before this Court entered its Order granting the Trustee's motion to amend its complaint. The Court of Appeals denied this motion. Applicant is not seeking fees incurred on this motion.

After this Court granted the Trustee's motion to amend his complaint, Applicant renewed the Trustee's motion to dismiss the appeal as moot. The Court of Appeals again denied the motion, but it instructed the parties to be prepared to argue mootness at oral argument.

Oral argument took place on December 7, 2022. The Trustee won the oral argument and the panel dismissed the appeal as moot on December 23, 2022.

However, in its Order dismissing the appeal, the panel pointed out that on December 9, 2022, the United States Supreme Court had granted the petition for a writ of certiorari in *Coinbase, Inc. Bielski*, No. 22-105, 2022 WL 17544994 (Dec. 9, 2022). The question presented by the petition is: “Does a non-frivolous appeal of the denial of a motion to compel arbitration oust a district court’s jurisdiction to proceed with litigation pending appeal, as the Third, Fourth, Seventh, Tenth, Eleventh and D.C. Circuits have held, or does the district court retain discretion to proceed with litigation while the appeal is pending, as the Second, Fifth, and Ninth Circuits have held?” Joint Petition for a Writ of Certiorari at i, *Coinbase*, No. 22-105, 2022 WL 3107708, at *i (July 29, 2022). The Court of Appeals added, “Unless the Supreme Court holds otherwise, we are bound to our precedent in *Britton* on this issue.” Memorandum, Court of Appeals, *Waldron v. Perkins Coie LLP*, No. 22-35104, ECF 52-1 at 1, n. 1.

Perkins filed three post-Order motions: (1) for reconsideration by the panel, (2) to stay the reconsideration motion pending the Supreme Court’s resolution of the *Coinbase* appeal, and (3) to stay the issuance of the mandate. Applicant drafted an opposition to the motion to stay the motion for reconsideration. Applicant did not oppose the reconsideration motion in light of the Federal Rules of Appellate Procedure, which provide that a party may not oppose a motion for

panel reconsideration unless the Court of Appeals requests a response. The Court of Appeals granted the motion to stay the reconsideration motion.

Despite winning the oral argument regarding mootness, Applicant is voluntarily reducing its fees in this project. PLG is not billing for time spent on the first motion for remand and it is billing only 50% for time spent opposing Perkins' motion to stay its panel reconsideration motion pending the Supreme Court's resolution of the *Coinbase* appeal.

Time Spent: 89.70

Amount: \$35,880

F. Mr. Dam's Two Appeals to District Court of Automatic Stay and Preliminary Injunction

This project relates to Jun Dam's appeal of two Orders of this Court: (1) *Memorandum Opinion and Order Regarding Stay and Motion for Order to Show Cause*, dated September 27, 2021, ECF No. 921; and (2) *Order Denying Mr. Dam's Motion to Dismiss and Granting Trustee's Motion for Preliminary Injunction*, dated February 23, 2022, ECF No. 39 in Adversary Proceeding No. 21-80053. Both Orders relate to Mr. Dam's lawsuit against Perkins Coie LLP, Lowell Ness, and affiliates.

During the Application Period, PLG drafted the appellee's brief, moved to strike noncomplying portions of appellant's statement of the case in his opening brief, and moved for sanctions for frivolous arguments.

The District Court has stayed the appeal pending mediation and struck the Trustee's motions without prejudice to re-filing them if mediation is unsuccessful.

Time: 81.6

Amount: \$32,640.00

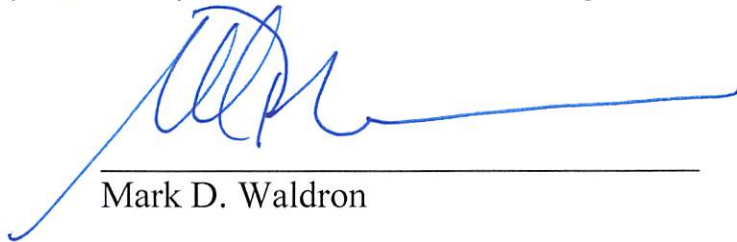
IV. [Intentionally omitted. Only Applies in Chapter 11.]

V. Other Information: None.

VERIFICATION

I, Mark D. Waldron, hereby under penalty of perjury verify that I have reviewed and approved the foregoing Narrative Summary and accompanying Fifth Interim Fee Application of the Potomac Law Group PLLC

Executed this 2 day of ^{February}~~January~~ 2023 in Tacoma, Washington.



Mark D. Waldron

Mark D. Waldron
Chapter 7 Trustee
6824 19th St. W., PMB 250
University Place, WA 98466
Phone: (253) 565-5800
trustee@mwaldronlaw.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

Case No.

**ORDER AWARDING COMPENSATION
FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES
PURSUANT TO 11 U.S.C. §330 or §331,
AND APPROVING THE PAYMENT OF
BANK FEES**

Debtor(s)

THIS MATTER HAVING come before the Court on the # _____ (☐ interim ☐ final)
application of _____ dated _____, docket # _____, notice
docket # _____ and certificate of service docket # _____, for an order allowing compensation
for services rendered and reimbursement of expenses in the above entitled case; and the court
being fully advised in the premises:

NOW THEREFORE the below listed amounts are hereby allowed and awarded as compensation and reimbursement pursuant to 11 USC §330 or §331, and approved as bank fees pursuant to §363 and §503(b), to the above-named applicant and are authorized to be disbursed or transferred from funds of the above entitled estate, subject to the availability of funds and the provision of any confirmed plan. *

Compensation in the amount	\$ _____
Reimbursement in the amount of	\$ _____
Bank fees	\$ _____
TOTAL	\$ _____

* If for first application, includes compensation earned pre-petition and filing fees and other costs incurred pre-petition.

Summary of all prior awards and approvals on previous applications:

Compensation	\$ _____
Reimbursement	\$ _____
Bank fees	\$ _____
Total	\$ _____

Disbursement information for this award:

Received directly from debtor by application (if for first application)	\$ _____
To be paid by transfer from attorney trust account:	\$ _____
To be paid by trustee	\$ _____
Total	\$ _____

///End of Order///

Presented by:

(Signature/address/phone)

Potomac Law Group PLLC
1905 7th Ave. W.
Seattle, WA 98119
(415) 297-0132